

### REMARKS

The Office Action of 02/02/2008 has been carefully considered. In response thereto, the claims have been amended as set forth above. Reconsideration in view of the foregoing amendments and the present remarks is respectfully requested.

Claims 110 and 124 were indicated as containing allowable subject matter, which indication is appreciatively acknowledged.

Claims 88, 95 and 116-119 were rejected as being unpatentable over Sugiyama in view of Hubner. Claims 106-108, 111-114, 120-122 and 125-128 were rejected as being unpatentable over the same base combination further in view of Faris and Sakui. Claims 109 and 123 were rejected as being unpatentable over the prior combination further in view of Daberko. These rejections are respectfully traversed.

#### **Rejection of Claims 88, 95 and 116-119 as Unpatentable Over Sugiyama in View of Hubner**

The rejection of claim 88 states in part:

[S]ugiyama fails to disclose the following:

- a) the second substrate is a thinned substrate having circuitry formed thereon.

However, Hubner discloses a thinned substrate (214) (For Example: See column 5 Line 12-160). It would have been obvious...to modify the semiconductor device of Sugiyama to include a thinned substrate as disclosed in Hubner *because it aids in providing a stabilizing support (For Example: See Column 3 Lines 1 and 2).*

The foregoing “motivation” is specious; Applicant respectfully disagrees.

Likely because of translation of the priority document into English, Hubner in places reads awkwardly and is somewhat unclear. Column 3, lines 1 and 2 is one such instance. The entire paragraph reads as follows:

If a three-dimensional circuit arrangement having more than two component planes is designed, one of the substrates must be thinned and must be provided with rear-side contacts. In the method according to the invention, *the other substrate*, which is firmly connected to the substrate to be thinned, in this case *acts as the stabilizing supporting plate*.

The intended reading of this passage, Applicant submits, is that the *unthinned* (“other”) substrate (*not* the thinned substrate) acts as a stabilizing support plate. Of course, the apparatus of Sugiyama is already provided with an unthinned substrate, which therefore acts as the desired stabilizing support plate. Accordingly, Sugiyama has no need of any additional stabilizing support plate; and even if it did have such a need, providing Sugiyama with a *thinned* substrate as per Hubner would not have the effect of a stabilizing support plate.

As no reasonable motivation has been identified for combining the teachings of the references in the manner indicated, the cited references are not believed to teach or suggest the invention of claim 88.

The same argument applies equally to claims 116 and 119.

Hence, it may be seen that the cited references does not teach or suggest the invention of claims 88, 116 or 119.

The various combinations of references used to reject the dependent claims do nothing to address the teachings absent from the base combination as noted above. Therefore, the dependent claims are believed to be allowable as depending on an allowable base claim.

Withdrawal of the rejections and allowance of claims 88, 95, 106-109, 111-114, 116-123 and 125-128 is respectfully requested.

Respectfully submitted,

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